

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

COMMON CAUSE, *et al.*,

PLAINTIFFS,

v.

ROBERT A. RUCHO, in his official capacity as
Chairman of the North Carolina Senate
Redistricting Committee for the 2016 Extra
Session and Co-Chairman of the Joint Select
Committee on Congressional Redistricting,
et al.,

DEFENDANTS.

CIVIL ACTION
No. 1:16-CV-1026-WO-JEP

THREE-JUDGE PANEL

LEAGUE OF WOMEN VOTERS OF NORTH
CAROLINA, *et al.*,

PLAINTIFFS,

v.

ROBERT A. RUCHO, in his official capacity as
Chairman of the North Carolina Senate
Redistricting Committee for the 2016 Extra
Session and Co-Chairman of the 2016 Joint
Select Committee on Congressional
Redistricting, *et al.*,

DEFENDANTS.

CIVIL ACTION
No. 1:16-CV-1164-WO-JEP

THREE JUDGE PANEL

**PLAINTIFFS' JOINT
MOTION FOR DISALLOWANCE OF COSTS**

Plaintiffs Common Cause et al., and Plaintiffs League of Women Voters of North Carolina, et al., (hereinafter, "Joint Plaintiffs), by and through undersigned counsel and

pursuant to Local Rule LR 54.1(b)(1), respectfully move for disallowance of costs sought by Legislative Defendants in this matter. As detailed in the brief in support of this motion, Legislative Defendants are not entitled to an award of costs because these cases were dismissed for lack of jurisdiction and, pursuant to 28 U.S.C. § 1919, it would not be “just” to award costs.¹ Even if it decides to award costs, the Court should substantially reduce the award because the Legislative Defendants’ Bill of Costs is largely unreasonable and unsupported.

Respectfully submitted, this 18th day of October, 2019.

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¹ Plaintiffs do not dispute the \$12,205.78 in costs awarded by the Supreme Court. This motion for disallowance address only the \$29,556.59 in pretrial- and trial-related costs sought by Legislative Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record.

This the 18th day of October, 2019.

/s/ Allison J. Riggs

Allison J. Riggs